

COMMODORE SEMICONDUCTOR GROUP
UNILATERAL ADMINISTRATIVE ORDER FOR ACCESS *
ADMINISTRATIVE RECORD FILE
INDEX OF DOCUMENTS

1. Memorandum to U.S. EPA Regional Administrators and Regional Counsels for Regions I-X from Mr. Thomas Adams, U.S. EPA, re: EPA policy on entrance and continued access to facilities for activities under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 6/5/87. P. 000001-000019. A June 5, 1987, Office of Solid Waste and Emergency Response (OSWER) Directive status form, a June 5, 1987, OSWER Directive status form, and a June 29, 1987, OSWER Directive Initiation Request form are attached.
2. Letter to Mr. Gerald Hansler, Delaware River Basin Commission (DRBC), from Mr. Edwin Erickson, U.S. EPA, re: Transmittal of a memorandum of agreement between DRBC and U.S. EPA Region III, 10/23/91. P. 000020-000030.
3. Document entitled, "Docket No. D-92-47 CP, Delaware River Basin Commission, Ground Water Protected Area, Audubon Water Company, Ground Water Withdrawal - Consolidated Approval Lower Providence Township, Montgomery County, Pennsylvania," prepared by the DRBC, 2/23/94. P. 000031-000037.
4. Deed between Valley Forge Recreations, Inc., and Lower Providence Township Municipal Authority, 7/18/94. P. 000038-000045. A map showing the transferred parcel of land and a form entitled, "Realty Transfer Tax Statement of Value" are attached.
5. Telephone conversation record of Mr. Bernard Beegle, Advanced Geoservices Corporation (AGC), with Mr. Alva Stead, re: Sampling of the wells on the golf course, 8/22/95. P. 000046-000046.
6. Letter to Mr. Richard Sheehan, from Mr. Bernard

* Administrative Record File available 3/2/00 updated 3/20/00.

- Beegle and Mr. William Richardson, AGC, re: Comments on analytical results for samples taken at the General Washington Golf Course, 2/12/96. P. 000047-000051. A certified mail receipt is attached.
7. Letter to Mr. Richard Sheehan, from Mr. Neil Clain, Harvey, Pennington, Herting & Renneisen, re: Transmittal of a site map depicting the locations of proposed well placements, 8/27/96. P. 000052-000053. A February 7, 1996, map entitled, "Plume Delineation Well Locations for Installation During Step 2" is attached.
 8. Letter to Mr. William Richardson, AGC, from Mr. Neil Clain, Powell, Trachtman, Logan, Carrle, Bowman & Lombardo, re: Transmittal of a right of entry agreement between Lower Providence Township Municipal Authority and Allen-Bradley Company, Inc., 12/18/96. P. 000054-000058.
 9. Telephone conversation record of Ms. Eileen Cwienk, AGC, with Mr. Richard Sheehan, Lower Providence Township Solicitor, re: Addition of monitoring well AUDMW-1 to access agreement, 1/22/97. P. 000059-000060.
 10. Letter to Ms. Nancy McFarland, Lower Providence Township Municipal Authority, from Mr. William Richardson, AGC, re: Notification of the activities to be conducted on property consistent with the right of entry agreement, 1/23/97. P. 000061-000063. A January, 23, 1997, facsimile transmittal memorandum to Mr. Richard Sheehan, Lower Providence Township Solicitor, from Ms. Eileen Cwienk, AGC, is attached.
 11. Facsimile memorandum To Mr. Richard Sheehan, Lower Providence Township Solicitor, from Ms. Eileen Cwienk, AGC, re: Transmittal of a draft access notification letter, 1/23/97. P. 000064-000064.
 12. Facsimile memorandum to Mr. Richard Sheehan, Lower Providence Township Solicitor, from Ms. Eileen Cwienk, AGC, re: Retransmittal of a January 23, 1997, facsimile memorandum regarding a draft access notification letter, 1/29/97. P. 000065-000065.

13. Letter to Mr. Richard Sheehan, Lower Providence Township Solicitor, from Ms. Eileen Cwienk, AGC, re: Transmittal of a revised "Exhibit A" map to be inserted into the access agreement, 2/5/97. P. 000066-000068. A January 23, 1997, site map entitled, "Exhibit A" is attached.
14. Letter to Ms. Nancy McFarland, Lower Providence Township Municipal Authority, from Mr. William Richardson, AGC, re: Notification of the commencement of field activities at the Commodore Semiconductor Group Site and an explanation of possible activities to be conducted on Lower Providence Township property, 2/6/97. P. 000069-000081. The following are attached:
 - a) a December 18, 1996, letter to Mr. William Richardson, AGC, from Mr. Neil Clain, Powell, Trachtman, Logan, Carrle, Bowman & Lombardo, transmitting a copy of the executed access agreement;
 - b) a November 18, 1996, right of entry agreement;
 - c) an undated map entitled, "Acetone, TCE and 111 TCA and Freon 113, Groundwater Results for 1995/1996;"
 - d) a July 14, 1995, letter to Mr. Richard Sheehan, from Mr. Neil Clain, Harvey, Pennington, Herting & Renneisen, transmitting the executed right of entry agreement;
 - e) a July 11, 1995, right of entry agreement.
15. Letter to Ms. Nancy McFarland, Lower Providence Township Municipal Authority, from Mr. Bernard Beegle and Mr. William Richardson, AGC, re: Comments on the groundwater analytical results for samples taken at the General Washington Golf Course, 8/7/97. P. 000082-000086. An undated table entitled, "Table 1, Validated Analytical Results (Detects Only) for AUD-MW-1M and AUD-MW-1D, Collected on April 23, 1997," and a certified mail receipt are attached.

16. Letter to Ms. Nancy McFarland, Lower Providence Township Municipal Authority, from Mr. William Richardson, AGC, re: Notification of field activities to be conducted on the Lower Providence Township Municipal Authority property beginning in November 1997 and continuing through March 1998, 11/14/97. P. 000087-000090. A certified mail receipt is attached.
17. Telephone conversation record with Joe Rock, General Washington Golf Course, re: Notification of the start date for the step and pumping tests, 11/21/97. P. 000091-000091.
18. Letter to Mr. Gregory Cavallo, DRBC, from Mr. Jonathan Rinde, Lower Providence Municipal Authority, re: Response to a request for a groundwater monitoring program to supplement the groundwater withdrawal permit application submitted to DRBC, 6/25/99. P. 000092-000092.
19. Excerpts from a report entitled, "Final Remedial Design Report and Remedial Action Work Plan for the Commodore Semiconductor Group Superfund Site," prepared by AGC, 7/30/99. P. 000093-000166.
20. Letter to Mr. William Richardson, AGC, from Ms. Ruth Scharr, U.S. EPA, re: Transmittal of comments on the Final Design Report and the Remedial Action Work Plan, 9/9/99. P. 000167-000174.
21. Letter to Ms. Ruth Scharr, U.S. EPA, from Mr. Kevin Hansen, AGC, re: Transmittal of Addendum #1 to the Remedial Action Health and Safety Plan, 9/22/99. P. 000175-000176.
22. Facsimile memorandum to Mr. Mike Maransky, Powell, Trachtman, Logan, Carrle, Bowman & Lombardo, from Mr. Kevin Hansen, AGC, re: Request to contact the General Washington Golf Course Counsel instead of the Lower Providence Township Counsel, 9/24/99. P. 000177-000185. The following is attached:

- a) a September 24, 1999, facsimile memorandum to Mr. Kevin Hansen, AGC, from Mr. Neal Basile, regarding site activities on Lower Providence Township Municipal Authority property;
 - b) an undated photocopy of a Mr. Michael Furey's business card;
 - c) a September 30, 1999, facsimile confirmation sheet;
 - d) an undated deed of grant between Lower Providence Township Municipal Authority and Allen-Bradley Company;
 - e) an October 20, 1999, electronic mail memorandum to Mr. William Richardson, AGC, Mr. Mike Maransky, and Mr. Neil Clain, Powell, Trachtman, Logan, Carrle, Bowman & Lombardo, from Mr. Kevin Hansen, AGC, regarding access to well AUD-MW-1M on the General Washington Golf Course;
 - f) an October 7, 1999, electronic mail memorandum to Mr. William Richardson, AGC, from Mr. Kevin Hansen, AGC, summarizing reasons the Lower Providence Township Municipal Authority is not willing to execute the agreement for access and easement.
23. Facsimile memorandum to Mr. Jonathan Rinde, Lower Providence Township Municipal Authority, from Ms. Ruth Scharr, U.S. EPA, re: Transmittal of information on the extraction wells, 9/24/99. P. 000186-000186.
24. Letter to Mr. Kevin Hansen, AGC, from Ms. Ruth Scharr, U.S. EPA, re: Notification of EPA's approval of the remedial action contractor, 9/29/99. P. 000187-000187.
25. Document entitled, "Docket No. D-99-21 CP, Delaware

River Basin Commission, Ground Water Protected Area, Lower Providence Township Municipal Authority, General Washington Golf Club Ground Water Withdrawal, Lower Providence Township, Montgomery County, Pennsylvania," prepared by DRBC, 9/30/99. P. 000188-000192.

26. Letter to Ms. Deborah McQuiston, Lower Providence Township Municipal Authority, from Mr. Kevin Hansen, AGC, re: Transmittal of information regarding proposed remedial action at the General Washington Golf Club, 10/5/99. P. 000193-000195.
27. Electronic mail memorandum to Mr. William Richardson, AGC, from Mr. Kevin Hansen, AGC, re: Summary of reasons the Lower Providence Township Municipal Authority is not willing to execute the agreement for access and easement, 10/7/99. P. 000196-000196.
28. Letter to Mr. Kevin Hansen, AGC, from Mr. Jonathan Rinde, Lower Providence Township Municipal Authority, re: Concerns regarding the proposed groundwater remediation at the General Washington Country Club, 10/8/99. P. 000197-000198.
29. Letter to Superintendent, General Washington Country Club, from Mr. Michael Maransky, Powell, Trachtman, Logan, Carrle, Bowman & Lombardo, re: Request for access to the General Washington Golf Course in order to begin groundwater remediation, 10/13/99. P. 000199-000209. An undated right of entry agreement and a certified mail receipt are attached.
30. Electronic mail memorandum to Mr. William Richardson, AGC, Mr. Mike Maransky and Mr. Neil Clain, Powell, Trachtman, Logan, Carrle, Bowman & Lombardo, re: Notification of five items to be included in the access and easement agreement in order for Lower Providence Township Municipal Authority to grant approval, 10/20/99. P. 000210-000210.
31. Letter to Mr. Jonathan Rinde, Lower Providence

Township Municipal Authority, from Mr. Michael Maransky, Powell, Trachtman, Logan, Carrle, Bowman & Lombardo, re: Request for an access and easement agreement, 10/26/99. P. 000211-000213. A certified mail receipt is attached.

32. Letter to Superintendent, General Washington Country Club, from Mr. Michael Maransky, Powell, Trachtman, Logan, Carrle, Bowman & Lombardo, re: Request for an access and easement agreement, 10/27/99. P. 000214-000216. A certified mail receipt is attached.

33. Letter to Mr. Michael Maransky, Powell, Trachtman, Logan, Carrle, Bowman & Lombardo, from Mr. Jonathan Rinde, Lower Providence Township Municipal Authority, re: Notification that the Lower Providence Township Municipal Authority declines access to the General Washington Golf Course, 11/1/99. P. 000217-000234. The following are attached:

- a) a November 3, 1999, Controlled Correspondence form to Mr. W. Michael McCabe, U.S. EPA, from Mr. Jonathan Rinde, private citizen;
- b) an October 26, 1999, letter to Mr. Jonathan Rinde, Lower Providence Township Municipal Authority, from Mr. Michael Maransky, Powell, Trachtman, Logan, Carrle, Bowman & Lombardo, requesting an access and easement agreement;

- c) an October 13, 1999, letter to Superintendent, General Washington Country Club, from Mr. Michael Maransky, Powell, Trachtman, Logan, Carrle, Bowman & Lombardo, requesting access to the General Washington Golf Course in order to begin the groundwater remediation;
 - d) an undated right of entry agreement;
 - e) an undated deed of grant;
 - f) an October 8, 1999, letter to Mr. Kevin Hansen, AGC, from Mr. Jonathan Rinde, Lower Providence Township Municipal Authority, regarding the proposed groundwater remediation at the General Washington Country Club.
34. Letter to Lower Providence Township Municipal Authority Board Members from Mr. Neil Clain, Powell, Trachtman, Logan, Carrle, Bowman & Lombardo, re: Comments on the decision made by the Lower Providence Township Municipal Authority to deny access for groundwater remediation, 11/4/99. P. 000235-000237.
35. Letter to Ms. Ruth Scharr, U.S. EPA, from Mr. Neil Clain, Powell, Trachtman, Logan, Carrle, Bowman & Lombardo, re: Request for EPA's assistance in attaining access to well AUD-MW-1M at the General Washington Country Club, 11/4/99. P. 000238-000239.
36. Letter to Mr. W. Michael McCabe, U.S. EPA, from Mr. Jonathan Rinde, Lower Providence Township Municipal Authority, re: Comments on the proposed groundwater remediation and a request for access to the property, 11/9/99. P. 000240-000244. A November 4, 1999, letter to Ms. Ruth Scharr, U.S. EPA, from Mr. Neil Clain, Powell, Trachtman, Logan, Carrle, Bowman & Lombardo, requesting EPA's assistance in attaining access to well AUD-MW-1M at the General Washington Country Club and a November 10, 1999, Controlled Correspondence form to Mr. W. Michael McCabe, U.S. EPA, from Mr. Jonathan Rinde, Lower Providence Township Municipal Authority, are attached.
37. Letter to Mr. Kevin Hansen, AGC, from Ms. Ruth

Scharr, U.S. EPA, re: Notification of EPA's approval of the revisions to Section 5 of the Remedial Action Work Plan, 11/10/99. P. 000245-000245.

38. Letter to Mr. Gregory Cavallo, DRBC, from Ms. Ruth Scharr, U.S. EPA, re: Transmittal of a copy of the Remedial Design Report and the Remedial Action Work Plan, 11/10/99. P. 000246-000246.
39. Letter to Ms. Ruth Scharr, U.S. EPA, from Mr. William Richardson, AGC, re: Request for EPA's assistance in attaining access to well AUD-MW-1M at the General Washington Country Club, 11/10/99. P. 000247-000247.
40. Letter to Mr. Jonathan Rinde, Lower Providence Township Municipal Authority, from Mr. Thomas Voltaggio, U.S. EPA, re: Response to comments on the proposed groundwater remediation and a request for access to the property, 11/19/99. P. 000248-000250.
41. Letter to Mr. Thomas Voltaggio, U.S. EPA, from Mr. Jonathan Rinde, Lower Providence Township Municipal Authority, re: Request for information in order to make a decision regarding access and easement, 11/21/99. P. 000251-000254. An October 20, 1999, electronic mail memorandum to Mr. William Richardson, AGC, Mr. Mike Maransky and Mr. Neil Clain, Powell, Trachtman, Logan, Carrle, Bowman & Lombardo, summarizing five items required for approval of the access and easement agreement and a November 21, 1999, facsimile transmittal cover sheet are attached.
42. Letter to Mr. Thomas Voltaggio, U.S. EPA, from Mr. Jonathan Rinde, Lower Providence Township Municipal Authority, re: Notification of the approximate value of the water to be removed from the General Washington Golf Course by the proposed groundwater remediation, 11/29/99. P. 000255-000257. A November 30, 1999, Controlled Correspondence form to Mr. Thomas Voltaggio, U.S. EPA, from Mr. Jonathon Rinde, Manko, Gold & Katcher, and a November 29,

1999, facsimile transmittal cover sheet to Mr. Thomas Voltaggio, U.S. EPA, from Mr. Jonathan Rinde, Lower Providence Township Municipal Authority, are attached.

43. Letter to Mr. Jonathan Rinde, Lower Providence Township Municipal Authority, from Mr. Anthony Dappolone, U.S. EPA, re: Response to questions from both a November 21, 1999, letter and a November 29, 1999, letter to EPA regarding proposed groundwater remediation at the General Washington Country Club and a request for access to the property, 12/2/99. P. 000258-000259.
44. Letter to Mr. Neil Clain, Powell, Trachtman, Logan, Carrle, Bowman & Lombardo, from Mr. Jonathan Rinde, Lower Providence Township Municipal Authority, re: Summary of the conditions required for the Lower Providence Township Municipal Authority to grant access to the General Washington Golf Course, 1/6/00. P. 000260-000261.
45. Letter to Mr. Jonathan Rinde, Lower Providence Township Municipal Authority, from Mr. Neil Clain, Powell, Trachtman, Logan, Carrle, Bowman & Lombardo, re: Response to conditions required for access to the General Washington Golf Course, 1/14/00. P. 000262-000264.
46. Letter to Ms. Ruth Scharr, U.S. EPA, from Mr. Kevin Hansen, AGC, re: Request for EPA's continued assistance in facilitating an agreement for access to the General Washington Golf Course, 1/19/00. P. 000265-000266.
47. Letter to Mr. Neil Clain, Powell, Trachtman, Logan, Carrle, Bowman & Lombardo, from Mr. Jonathan Rinde, Lower Providence Township Municipal Authority, re: Notification that the Lower Providence Township Municipal Authority has decided to continue denying

access to the General Washington Country Club,
1/28/00. P. 000267-000268.

48. Telephone conversation record of Ms. Sarah Keating and Ms. Ruth Scharr, U.S. EPA, with Mr. Jonathan Rinde, Lower Providence Township Municipal Authority, re: Request for access to the Lower Providence Township Municipal Authority property and notification that a Unilateral Administrative Order (UAO) is being prepared, 2/22/00. P. 000269-000269.
49. Unilateral Administrative Order For Access to Implement Remedial Action In the Matter of: Lower Providence Township Municipal Authority, Docket No. CERC-3-2000-0003, 2/28/00. P. 000270-000288. A February, 28, 2000, memorandum to Mr. Bradley Campbell, U.S. EPA, from Mr. Abraham Ferdas and Mr. William Early, U.S. EPA, transmitting the Unilateral Administrative Order for Access to Implement Remedial Action for review and signature is attached.
50. Telephone conversation record of Ms. Sarah Keating and Ms. Ruth Scharr, U.S. EPA, with Ms. Deborah McQuiston, Lower Providence Township Municipal Authority, re: Comments on a proposed meeting with EPA to discuss the UAO for Access, 3/2/00. P. 000289-000289.
51. Telephone conversation record of Ms. Sarah Keating and Ms. Ruth Scharr, U.S. EPA, with Mr. Jonathan Rinde, Lower Providence Township Municipal Authority, re: Comments concerning the proposed meeting with EPA and the corrected docket number on the UAO for Access, 3/8/00. P. 000290-000290.
52. Unilateral Administrative Order for Access to Implement Remedial Action In The Matter Of: Lower Providence Township Municipal Authority, Docket No. III-2000-0010-DC, 3/8/00. P. 000291-000309. A March 8, 2000, transmittal letter to Mrs. Deborah McQuinton, Lower Providence Township Municipal Authority, is attached.